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UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

IN RE: Case No.: 24-30074 DM

LEGAL RECOVERY, LLC Chapter 11

Debtor ATTORNEY DISCLOSURE STATEMENT

I, Leeds Disston, declare:

- 1. I am an attorney at law licensed to practice before all the courts of this State and this Court.
- 2. I have not received compensation for this case from any source and have not entered into an agreement with debtor, but in response to the Trustee's objection to my previous application for employment, the debtor, through its manager Demas Yan, and I have agreed to the following terms of employment: Fixed fee of \$15,000 to be paid on confirmation of Subchapter V plan. The services to be rendered are all ordinary and necessary legal services in connection with representing the debtor in its Chapter 11 case, including all legal work to resolve outstanding claims and adversary proceedings. If approved, the fixed fee will be included in the proposed plan to be paid on confirmation. I will not make any other motion for attorney fee in this case.
- 3. I have not shared nor agreed to share my compensation with anyone, but I will, if necessary and appropriate, obtain legal advice from experienced bankruptcy specialist at my own expenses.
- 4. Neither myself nor any member of my office is an insider, has or holds any interests of debtor's, is related to debtor in any way except as debtor's attorney, and otherwise has no stake in debtor's assets or liabilities. Further, neither I nor any member of my staff is related to debtor, its accountants or attorneys, except as debtors attorney, or to debtor's

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creditors, their respective attorneys or accountants, or to the U.S. trustee, the trustee's staff or members of its office, or any other party in interest. I declare under penalty of perjury that the foregoing is true and correct. Dated: May 28, 2024 /s/ Leeds Disston, Esq. Proposed Attorney for Debtor

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